

# Exhibit

# I

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13 ASETEK DANMARK A/S and  
14 Counterdefendant ASETEK USA, INC.

15 **UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

16  
17 ASETEK DANMARK A/S,  
18 Plaintiff and  
19 Counterdefendant,  
20 ASETEK USA, INC.,  
21 Counterdefendant,  
22  
23 v.  
24 COOLIT SYSTEMS, INC.,  
25 Defendant and  
Counterclaimant,  
26 COOLIT SYSTEMS USA INC., COOLIT  
SYSTEMS ASIA PACIFIC LIMITED,  
COOLIT SYSTEMS (SHENZHEN) CO.,  
LTD.,  
Defendants,  
CORSAIR GAMING, INC. and CORSAIR  
MEMORY, INC.,  
Defendants.

CASE NO. 3:19-cv-00410-EMC

**DECLARATION OF ANDRÉ S.  
ERIKSEN IN SUPPORT OF ASETEK  
DANMARK A/S'S OPPOSITION TO  
DEFENDANTS' SUMMARY JUDGMENT  
MOTION**

Date: May 5, 2022  
Time: 1:30 PM  
Location: Courtroom 5, 17<sup>th</sup> Floor  
Judge: Hon. Edward M. Chen

1 I, ANDRÉ S. ERIKSEN, declare as follows:

2 1. I am the founder and Chief Executive Officer of Plaintiff and Counterdefendant  
3 Asetek Danmark A/S (“Asetek”). I submit this declaration in support of the Asetek’s Opposition to  
4 Defendants’ Motion for Summary Judgment and other oppositions to pending motions. I make this  
5 declaration of my own personal knowledge and will competently testify thereto if called upon to do  
6 so.

7 2. I designed and developed the Antarctica “Water Chill” Liquid Cooling Kit  
8 (“Antarctica”) in 2003-2004. The Antarctica was manufactured by Asetek in our own facilities in  
9 Denmark and had a plurality of microchannels on the copper cold plate. I also developed the tool for  
10 cutting the microchannels in the cold plate.

11 3. The Antarctica was sold in the U.S. in the 2004-2006 time frame.

12 4. The Antarctica had only one version/generation of the cold plate, which had  
13 microchannels. Although the hardware for mounting the waterblock to the CPU was different for  
14 Intel and AMD, and also varied between different generations of CPUs, the cold plate was the same  
15 in all versions of the Antarctica. Similarly, different kits included different sizes/number of radiators,  
16 tubing, etc., but all kits sold included the same cold plate.



23 Antarctica waterblock

24 5. I gave my counsel at Finnegan an Antarctica waterblock sample, shown above. That  
25 sample is representative of the cold plates in all the Antarctica kits sold in the U.S. in 2004–2006. I  
26 only provided my counsel that one sample and understand that it has been used as a prior art device  
27 in this case, and that it was made available for inspection by defendants’ expert. That sample is the

same as and representative of a version of the Antarctica waterblock sold or offered for sale in the U.S. in 2004-2006.

6. I offered the Antarctica for sale at trade shows in the U.S. in 2004. I also demonstrated the Antarctica waterblock sample I later gave to Finnegan at trade shows in the U.S. in early 2004. Accordingly, that particular Antarctica sample itself was also publicly available and in public use in the U.S. in 2004.

7. In its supplemental interrogatory responses served on August 31, 2021 in this case, Asetek conceptually described redesigns for its gaskets in its Gen 4, 5, 6 and 7 products. We had not created any drawings, CADs or the like for those gasket redesigns at that time. We later incorporated those ideas into CADs for those redesigns, which were not ready until on or about November 19, 2021.

8. Asetek's first product samples incorporating its redesigns in this case were made by our contract manufacturer in China and the earliest they were available for shipment to us was on or about January 26, 2022.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 14<sup>th</sup> day of April, 2022 in Trysil, Norway.

By: John G. Eriksen  
André S. Eriksen